

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

TAKIYA GILLIS

CRIMINAL NO. _____

DATE FILED: _____

VIOLATIONS:

18 U.S.C. § 924(a)(1)(A) (making a false statement to a federal firearms licensee –

5 counts)

Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. Mike & Kate's Sports Shoppe, 7492 Oxford Avenue in Philadelphia, Pennsylvania, possessed a federal firearms license ("FFL") and was authorized to deal in firearms under federal laws.

2. Northeast Firearms, 915 Main Street in Honesdale, Pennsylvania, possessed a federal firearms license ("FFL") and was authorized to deal in firearms under federal laws.

3. Ed's Sports Shop, 308 West Broad Street in Tamaqua, Pennsylvania, possessed a federal firearms license ("FFL") and was authorized to deal in firearms under federal laws.

4. The Philadelphia Archery and Gun Club, 831 Ellsworth Street in

Philadelphia, Pennsylvania, possessed a federal firearms license (“FFL”) and was authorized to deal in firearms under federal laws.

5. FFL holders are licensed, among other things, to sell firearms and ammunition. Various rules and regulations, promulgated under the authority of Chapter 44, Title 18, United States Code, govern the manner in which FFL holders are permitted to sell firearms and ammunition.

The rules and regulations governing FFL holders require that a person seeking to purchase a handgun fill out a Firearms Transaction Record, ATF Form 4473. Part of the Form 4473 requires that the prospective purchaser certify that all his or her answers on Form 4473 are true and correct. The Form 4473 requires the purchaser to answer questions about the purchase, including a question, “Are you the actual buyer of the firearm(s) listed on this form? Warning: You are not the actual buyer if you are acquiring the firearm(s) on behalf of another person.” The Form 4473 also contains a warning that falsely answering yes to that question and falsely claiming to be the actual buyer of the firearm(s) is a crime punishable as a felony.

6. FFL holders are required to maintain a record, in the form of a completed Form 4473, of the identity of the actual buyer of firearms sold by the FFL holder, including the buyer’s home address and date of birth to ensure that the person was not prohibited from purchasing a firearm.

7. On or about each of the dates specified in the chart below, at various locations, including gun shows, in the Eastern District of Pennsylvania, defendant

TAKIYA GILLIS

knowingly made a false statement and representation with respect to the information required to

be kept in the records of a federally licensed firearms dealer in connection with the acquisition of each of the firearms listed below, from the federally licensed firearms dealers listed below, certified on the Form 4473 that she was the actual buyer of the firearm, when, as defendant well knew, this statement was false and fictitious.

COUNT	DATE AND FFL	FIREARM(S) PURCHASED
1	February 12, 2005 FFL: Mike & Kate's Sports Shoppe 7492 Oxford Avenue Philadelphia, Pennsylvania 19111	Bushmaster, .223 caliber pistol, model Carbon 15, serial number D05992
2	February 26, 2005 FFL: Mike & Kate's Sports Shoppe 7492 Oxford Avenue Philadelphia, Pennsylvania 19111	Taurus, .40 caliber pistol, model PT140, serial number SWB36542
3	March 12, 2005 FFL: Ed's Sports Shop 308 West Broad Street Tamaqua, Pennsylvania 18252	Glock, 9 millimeter pistol, model 19, serial number CFT916US
4	March 12, 2005 FFL: Northeast Firearms 915 Main Street Honesdale, Pennsylvania 18431	Glock, .45ACP caliber pistol, model 30, serial number DYK739US

5	January 25, 2007 FFL: Philadelphia Archery and Gun Club 831 Ellsworth Street Philadelphia, Pennsylvania 19147	Ruger .357 magnum revolver, model SP101, serial number 573-59415
---	---	---

All in violation of Title 18, United States Code, Section 924(a)(1)(A).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violations of Title 18, United States Code, Section 924(a)(1)(A),
set forth in this indictment, defendant

TAKIAY GILLIS

shall forfeit to the United States of America the firearms involved in the commission of these
offenses, including, but not limited to:

1. Bushmaster, .223 caliber pistol, model Carbon 15, serial number D05992;
2. Taurus, .40 caliber pistol, model PT140, serial number SWB36542;
3. Glock, 9 millimeter pistol, model 19, serial number CFT916US;
4. Glock, .45ACP caliber pistol, model 30, serial number DYK739US; and
5. Ruger .357 magnum revolver, model SP101, serial number 573-59415.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United
States Code, Section 924(d).

_____ **A TRUE BILL:** _____

_____ **GRAND JURY FOREPERSON**

PATRICK L. MEEHAN
UNITED STATES ATTORNEY